

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

Criminal No. 23-20022

v.

Hon. Gershwin A. Drain

Mohamed Kazkaz, *et al.*

Defendants

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**DISCOVERY NOTICE**

1. The attorney for the government knows that the defendant made relevant written or recorded statements, (including grand jury testimony), and/or relevant oral statements made in response to interrogation, whether before or after arrest, by a person then known to the defendant to be a government agent, whether or not the statement is included in a written record, as follows:

☒ Not Applicable

Date	Agent/Agency	Type (written, recorded, grand jury, oral)
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2. The attorney for the government knows that defendant has a prior criminal record:

☒ NO                      ☐ YES

3. The following books, papers, documents, photographs and tangible objects are within the possession, custody or control of the government and are intended to be used as evidence in chief at trial, are known to the government to be material to the preparation of the defense, or were obtained from or belong to the defendant:

Evidence recovered during the execution of search warrants referenced in paragraph 6.

4. Results or reports of the following physical or mental examinations, or scientific tests or experiments, are within the possession, custody or control of the government, and are either intended to be used as evidence in chief at trial or are known to the government to be material to the preparation of the defense:

n/a

5. The government intends to introduce at trial testimony from one or more experts in the following areas of expertise:

The government reserves the right to contact individuals familiar through experience with Medicare rules and regulations.

6. The government may introduce evidence obtained from execution of the following search warrants:

☐ Not Applicable

Date Obtained	Docket Number(s)
3/10/2022	22-mc-50599
9/9/2022	22-mc-50599-2
1/14/2023	22-mc-50599-3
1/14/2023	22-mc-50599-4
1/17/2023	22-mc-50599-5
1/14/2023	22-mc-50599-6
1/14/2023	22-mc-50599-7
1/14/2023	22-mc-50599-8
1/14/2023	22-mc-50599-9
1/14/2023	22-mc-50599-10
1/14/2023	22-mc-50599-11
1/14/2023	22-mc-50599-12
3/23/2023	22-mc-50599-13

7. The government may introduce evidence obtained through wiretaps or other electronic surveillance:

☐ Not Applicable

Type: (wiretap, bug, etc.)      Docket Number(s)

Consensual Recordings provided to defense counsel in discovery.

8. The government intends to offer evidence under Rule 404(b), Fed. R. Evid.

Yes      ☐ No      ☒ Unsure

9. The attorney for the government is aware of the obligations imposed by *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny and will comply with their obligation to provide defense counsel with exculpatory evidence that is material to either guilt or to punishment in time for effective use at trial.

10. If the government discovers additional information of the type described in Paragraphs 1 through 8; it will advise defense counsel in writing. Upon specific request of the defendant the government will make available for inspection or copying the items described in Paragraphs 1, 3, and 4; will furnish the record referred to in Paragraph 2; will provide a summary (which will include the witnesses' qualifications, opinions, and the bases and reasons for the opinions) of the anticipated testimony described in Paragraph 5 and will provide notice of the general nature of the evidence referred to in Paragraph 8. The government's compliance with any specific request will trigger the defendant's duty to provide the reciprocal discovery denoted in Fed. R. Crim. P. 16(b)(1)(A)-(C). If the defendant makes a general request for discovery the government will construe it as a request for each item described in Fed. R. Crim. P. 16(a)(1) (A)-(G). The government's compliance with the defendant's general request will trigger the defendant's duty to provide reciprocal discovery of each item specified in Fed. R. Crim. P. 16(b)(1)(A)-(C).

Respectfully Submitted,

Dawn N. Ison  
United States Attorney

s/Philip A. Ross

Philip A. Ross

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Dated: July 6, 2023

## CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2023, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Kenneth R. Chadwell  
Barry Resnick  
Robert Harrison  
Doraid Elder  
Martin E. Crandall

I further certify that I have mailed by United States Postal Service the document to the following non-ECF participants:

n/a

s/Philip A. Ross  
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